

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ALABAMA  
NORTHEASTERN DIVISION**

**GEMSTONE FOODS, LLC and  
RCF, LLC**

**Plaintiffs;**

**v.**

**AAA FOODS ENTERPRISES, INC.;  
A&M CONSULTING FIRM, LLC;  
FARM FRESH FOODS, LLC;  
COOPER, HILL & LECROIX,  
CPAs; MICHAEL CLAUDE  
ENSLEY; ANNETTE CARR;  
SHANE PASS; MARK  
WELBORNE; MATTHEW  
WESTER; EDWARD L. HILL;  
GARY HILL; DEBORAH  
CAMPOS; and John and Jane Does  
1-10**

**Defendants.**

**- AND -**

**MICHAEL ENSLEY, et al.,**

**Plaintiffs;**

**v.**

**BEN O. TURNAGE, et al.,**

**Defendants.**

**Case No.: 5:15-cv-2207-MHH**

**Case No.: 5:15-cv-01179-MHH**

## **UNOPPOSED MOTION TO EXTEND PLEADINGS DEADLINES**

COME NOW Gemstone Foods, LLC and RCF, LLC (“Plaintiffs”), through counsel, and presents their Unopposed Motion to Extend Pleadings Deadlines.

1. The Court has entered a Scheduling Order establishing that no causes of action, defenses, or parties will be allowed after August 15, 2017.
2. Plaintiffs request an extension by ten (10) days, or until August 25, 2017.
3. This motion is not being made for the purpose of delay or any improper purpose, but rather so justice and fairness can be accomplished.
4. Undersigned has contacted counsel of record regarding the relief sought by this motion, and counsel has no objection.

WHEREFORE, Plaintiff respectfully prays that the Court grant this motion and extend the deadline by August 25, 2017.

This the 15th day of August, 2017.

Respectfully submitted,

/s/Michael A. Heilman

Michael A. Heilman (admitted *pro hac vice*)

GEMSTONE FOODS, LLC AND RCF, LLC

OF COUNSEL:

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### **CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

M. Jefferson Starling, III  
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This the 15th day of August, 2017.

*/s/Michael A. Heilman*

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Michael A. Heilman (admitted *pro hac vice*)